



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 7, 2012

MARTIN H. NESBITT, TREASURER  
OBAMA FOR AMERICA  
PO BOX 8102  
CHICAGO, IL 60680

**Response Due Date**  
**07/12/2012**

IDENTIFICATION NUMBER: C00431445

REFERENCE: MAY MONTHLY REPORT (04/01/2012 - 04/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Your report discloses Offsets to Operating Expenditures on Schedule A-P supporting Line 20(a) of the Detailed Summary Page. However, your current and prior reports do not disclose an equal or greater amount of the original disbursements to these vendors (see attached). Please be advised that if there are not corresponding expenditures for these entries, it may constitute an excessive or prohibited contribution. Please amend your report or provide an explanation for this apparent discrepancy. (11 CFR § 104.3(a)(4)(v))
2. The Commission notes the disgorgement to Fisher House Foundation disclosed on Schedule B-P supporting Line 23 of your report. Please amend your report to identify the original contribution by itemizing the name of the contributor, date and amount of the original contribution as a memo entry on Schedule B-P. 11 CFR § 104.8(d)(4)
3. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B-P supporting Line 23 of your report to clarify the following description: "Event Consulting." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\\_purpose\\_list\\_3507.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf).

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4. Schedule B-P of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the campaign related payments to any one vendor by the campaign/staff aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount, and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

5. Your report discloses a debt owed to CDW Direct, LLC with an outstanding beginning balance of \$37,564.32. The previous report filed by your committee discloses a closing balance of \$183,036.95. These amounts should be the same. Please correct this discrepancy and file an amendment to your report(s). (2 U.S.C. § 434(b)(8) and 11 CFR § 104.11)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1165.

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Sincerely,

A handwritten signature in black ink, reading "Rebecca Hough". The signature is written in a cursive, flowing style with a long horizontal flourish at the end.

Rebecca Hough  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

**Offsets to Operating Expenditures**  
**Obama for America (C00431445)**

Name	Date	Amount	Additional Text
Apreza, Ernesto	4/12/2012	\$500.00	Equipment Reimbursement
Hutchinson, Maya	4/3/2012	\$250.00	Equipment Reimbursement
McMurtrey, Garrison	4/2/2012	\$250.00	Equipment Reimbursement
Obama Victory Fund 2012	4/19/2012	\$9,334.81	Fundraising Reimbursement
Ross, Gregg	4/3/2012	\$600.00	Equipment Reimbursement
Zelman, Allison	4/1/2012	\$250.00	Equipment Reimbursement